

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK**

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SHORELINE AVIATION, INC., : Case No. 2:20-cv-02161-JMA-SIL
Plaintiff, :
v. :
CYNTHIA L. HERBST, SOUND AIRCRAFT :
FLIGHT ENTERPRISES, INC., RYAN A. PILLA, :
Defendants. :
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**SOUND AIRCRAFT FLIGHT ENTERPRISE, INC.'S, CYNTHIA L. HERBST'S, AND RYAN
PILLA'S NOTICE OF MOTION FOR SUMMARY JUDGMENT PURSUANT TO FEDERAL
RULE OF CIVIL PROCEDURE 56**

PLEASE TAKE NOTICE that defendants Sound Aircraft Flight Enterprise, Inc., Cynthia L. Herbst, and Ryan A. Pilla (“Herbst Defendants”) through their undersigned attorneys, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 56, before the honorable Steven I. Locke, United States District Court for the Eastern District of New York, at 100 Federal Plaza, Central Islip, NY 11722, as soon as practically possible, for an Order granting summary judgment on all of plaintiff Shoreline Aviation’s claims, and for other and further relief as the Court deems just and proper. In support the Herbst Defendants submits the following documents which are being filed contemporaneously with this motion: a memorandum of law; a Local Civil Rule 56.1 statement of undisputed material facts; and declarations from Cynthia L. Herbst, Ryan A. Pilla, and Lindsey R. Skibell (enclosing exhibits), which are all dated June 16, 2023.

Dated: New York, New York
June 16, 2023

GLENN AGRE BERGMAN &
FUENTES LLP

By: /s/ Lindsey (Reid) Skibell
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*Attorneys for Cynthia L. Herbst, Sound Aircraft
Flight Enterprises, Inc., and Ryan A. Pilla*

PROOF OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via email, on June 16, 2023, upon counsel for Shoreline Aviation:

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/s/ Lindsey (Reid) Skibell
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